

EXHIBIT 10

EXHIBIT E

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

E. JEAN CARROLL,)
Plaintiff,)
)
-against-) 20-cv-7311(LAK)
)
DONALD J. TRUMP, in his)
personal capacity,)
Defendant.)
_____)

CONFIDENTIAL

VIDEOTAPED DEPOSITION OF
E. JEAN CARROLL
New York, New York
Friday, October 14, 2022

Reported By:
CATHI IRISH, RPR, CRR, CLVS

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2 defendant's statements?

3 A. Absolutely.

4 Q. Why do you think that?

5 A. I believe they thought that the
6 column had taken a hit. Here it was
7 probably the number one feature for years
8 and I'm a liar.

9 Q. Did someone from Elle tell you
10 that?

11 A. No, they would never admit it.

12 Q. Who advised you that you were
13 being terminated from Elle Magazine?

14 A. The managing editor.

15 Q. Who was that?

16 A. I had to look her up when she
17 called, Erin Hobday. I thought she was
18 calling me to invite me to the Christmas
19 party.

20 Q. Were you surprised by your
21 termination?

22 A. That's putting it mildly.

23 Q. In what manner were you advised?

24 A. Very cheerful conversation. She
25 said I'm calling to inform you that we

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2 are not relevant but DF99WWW24RY-

3 dms-ngarcia@hearst.com.

4 A. Yes.

5 Q. The date is 8/4/2019?

6 A. Yes.

7 Q. Okay. Do you know who ngarcia at
8 Hearst would be?

9 A. Who?

10 Q. I'll state it differently.

11 A. Oh, Nina Garcia.

12 Q. Exactly. Who is Ms. Garcia?

13 A. Ms. Garcia is a well respected
14 editor in the magazine world. She is the
15 editor-in-chief of Elle. She's also one
16 of the stars of Project Runway.

17 Q. She was the editor-in-chief at
18 Elle at this time?

19 A. Yes.

20 Q. Did you have a relationship with
21 Ms. Garcia?

22 A. No, just an admirer of hers. I
23 liked her style, I liked her on Project
24 Runway.

25 Q. According to the contents of this

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2 communication, it states "Hi, Kate, Emma
3 told me you are aware of the E. Jean
4 situation. Sadly she will not reconsider
5 her exclusive with New York Magazine.
6 I've been talking to Erin Hobday about our
7 situation with HR, and Brandy about our PR
8 strategy. Both feel prepared to move
9 forward. I don't feel it sets the right
10 precedent if we keep her. Let me know
11 your thoughts."

12 A. Exactly.

13 Q. Do you know who Erin --

14 MS. KAPLAN: I think she was
15 going to say exactly. Anything else?

16 THE WITNESS: This is a shocking
17 e-mail for me because what precedent
18 are they talking about, does anybody
19 know?

20 BY MS. HABBA:

21 Q. I'll ask you some more detailed
22 questions.

23 According to the contents of this
24 communication that I just read, it is said
25 that you would not reconsider your

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2 your blog?

3 A. Oh, Substack, yes, I do.

4 Q. You do. Do you know how much?

5 A. Yes, 70,000 a year.

6 Q. And how long have you been
7 generating that amount of income from the
8 blog?

9 A. It was immediately popular. Not
10 a big huge massive salutation but it's
11 doing all right. I enjoy writing it.

12 Q. Did it increase after 2019?

13 A. Oh, I didn't start it until 2021.

14 Q. So it's pretty successful since
15 you started it?

16 A. It's successful for a Substack,
17 yes.

18 Q. Have you sued anyone else?

19 A. No.

20 Q. Have you ever been sued?

21 A. No.

22 Q. Last set of questions I have for
23 you, you stated in the public that you had
24 DNA from the former president; is that
25 correct?

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2 A. Yes.

3 Q. Why did you state that?

4 A. Because we sent the dress to be
5 examined and then we got back a report.
6 Robbie published it.

7 Q. What did that report say that you
8 recall? And don't divulge anything that's
9 privileged, please, so conversations
10 between you and your attorney I don't want
11 to know.

12 A. It is so far above my head. The
13 reports about DNA are so detailed and so
14 much scientific rigor is required to
15 understand even the opening paragraph, I
16 can't really -- I can't say.

17 Q. And how did you discover that
18 there might have been a trace of DNA from
19 this event?

20 MS. KAPLAN: I don't think you
21 can answer that question.

22 MS. HABBA: Okay. I think I'm
23 done.

24 Oh, yes, I forgot.

25 ///